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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

1 ARIEL ABITTAN,

Case No. 5:20-CV-09340-NC

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2 PLAINTIFF,

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4 v.
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6 LILY CHAO (A/K/A TIFFANY CHEN, A/K/A
7 YUTING CHEN), DAMIEN DING (A/K/A
8 DAMIEN LEUNG, A/K/A TAO DING),
9 TEMUJIN LABS INC. (A DELAWARE
10 CORPORATION), AND TEMUJIN LABS
11 INC. (A CAYMAN CORPORATION),
12
13 DEFENDANTS,
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15 and
16
17 EIAN LABS INC.,
18
19 NOMINAL DEFENDANT.

**DECLARATION OF
CONSTANTINE P. ECONOMIDES IN
SUPPORT OF PLAINTIFF'S
OPPOSITION TO DEFENDANT'S
MOTION TO DISMISS**

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Judge: Nathanael Cousins
Date: December 15, 2021
Time: 1:00 PM
Place: Courtroom 5, 4th Floor

1 1. I am an attorney licensed to practice law in New York and Florida and am admitted
2 to practice before this Court *pro hac vice*. I am counsel with the firm Roche Freedman LLP, and
3 counsel for Plaintiff Ariel Abittan (“Plaintiff”). I make this declaration based upon my knowledge
4 of the facts stated herein, and if called to testify, I could and would testify competently thereto.
5 I submit this declaration in support of Plaintiff’s Opposition to Defendant’s Motion to Dismiss.

6 2. Attached hereto as Exhibit A is a true and correct copy of Plaintiff's Opposition to
7 Defendant's [Temujin Labs Inc. (Delaware)] Motion to Dismiss. [ECF No. 49].

8 3. Attached hereto as Exhibit B is a true and correct copy of an email exchange between
9 the parties' counsel dated November 5, 2021 and November 8, 2021.

10 I declare under penalty of perjury that the foregoing is true and correct.

11 || Executed this 22nd day of November, 2021 at Miami, Florida.

12 | Dated: November 22, 2021

ROCHE FREEDMAN LLP

/s/ Constantine P. Economides
Constantine P. Economides (*pro hac vice*)

Attorney for Plaintiff Ariel Abittan